

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

BCS Insurance Company ,

Plaintiff,

vs.

Big Thyme Enterprises, Inc.; David A. Crotts  
& Associates, Inc.; and David A. Crotts,

Defendants.

Civil Action No: 3:12-cv-00933-JFA

**DISCOVERY STATUS REPORT**

Party Submitting Report: BCS Insurance Company

1. Are the parties on track to complete discovery on or before the discovery deadlines set forth in the most current scheduling order?

☒ Yes

☐ No

2. Indicate the date on which the first set of interrogatories were (or will be) served on your opponent: BCS does not anticipate serving discovery requests. BCS contends the coverage issue in this action can be adjudicated without inquiry into factual matters.
3. Indicate the date on which the first deposition was (or will be) scheduled: No depositions have been scheduled or are anticipated by BCS.
4. Indicate what discovery remains to be completed in this case: None. Big Thyme Enterprises, Inc. served interrogatories and requests for production on August 29, 2012 by U.S. Mail. The discovery served by Big Thyme is untimely under the Scheduling Order. BCS intends to object to the Big Thyme discovery, at a minimum, on the untimeliness of service.

Date: September 5, 2012

s/ Clay Robinson

Clay Robinson [Fed. ID # 3505]  
ROBINSON, MCFADDEN & MOORE, P.C.

Counsel for BCS Insurance Company